

GARMAN TURNER GORDON LLP  
 GERALD M. GORDON  
 Nevada Bar No. 229  
 E-mail: ggordon@gtg.legal  
 JARED SECHRIST  
 Nevada Bar No. 10439  
 E-mail: jsechrist@gtg.legal  
 7251 Amigo St., Suite 210  
 Las Vegas, Nevada 89119  
 Tel: (725) 777-3000 / Fax: (725) 777-3112

MICHAEL D. NAPOLI, ESQ.  
*Pro hac vice*  
 AKERMAN LLP  
 2001 Ross Avenue, Suite 3600  
 Dallas, Texas 75201  
 Tel: (214) 720-4360 / Fax: (214) 720-8116  
 Email: michael.napoli@akerman.com  
 ARIEL E. STERN, ESQ.  
 Nevada Bar No. 8276  
 AKERMAN LLP  
 1635 Village Center Circle, Suite 200  
 Las Vegas, Nevada 89134  
 Tel: (702) 634-5000 / Fax: (702) 380-8572  
 Email: ariel.stern@akerman.com

*Attorneys for Tecumseh–Infinity Medical  
 Receivable Fund, LP*

**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA**

In re:  
 INFINITY CAPITAL MANAGEMENT, INC.  
 Debtor.

Case No.: 21-14486-abl  
 Chapter 7

Adversary Case No. 21-01167-abl

HASELECT-MEDICAL RECEIVABLES  
 LITIGATION FINANCE FUND  
 INTERNATIONAL SP,  
 Plaintiff,

**DEFENDANT’S EX PARTE MOTION  
 TO EXCEED PAGE LIMIT  
 FOR REPLY TO PLAINTIFF  
 HASELECT-MEDICAL  
 RECEIVABLES LITIGATION  
 FINANCE FUND INTERNATIONAL  
 SP’S OPPOSITION TO TECUMSEH-  
 INFINITY MEDICAL RECEIVABLE  
 FUND, LP’S MOTION FOR  
 PARTIAL SUMMARY JUDGMENT  
 AS TO CERTAIN DISPUTED  
 RECEIVABLES**

v.  
 TECUMSEH-INFINITY MEDICAL  
 RECEIVABLES FUND, LP,  
 Defendant.

TECUMSEH-INFINITY MEDICAL  
 RECEIVABLES FUND, LP,  
 Counter-Claimant,

Date: Ex Parte  
 Time: Ex Parte

v.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Defendant.

Tecumseh–Infinity Medical Receivable Fund, LP (“Tecumseh”), through counsel of record, GARMAN TURNER GORDON LLP, submits this Ex Parte Motion To Exceed Page Limit for Reply (the “Reply”) to HASElect-Medical Receivables Litigation Finance Fund International SP’s (“HASElect”) Opposition (“Opposition”) [ECF No. 122] to Motion for Partial Summary Judgment as to Direct Purchase Receivables [ECF No. 90] (the “MPSJ”). This Motion is made and based upon Local Rule 9014(e) and the pleadings and papers on file in this case.

Good cause exists to extend the page limit for the Reply. The MPSJ involves a dispute regarding 4,190 medical receivables with a collective face amount in excess of \$19 million. Tecumseh attached exhibits to the Motion establishing the nature of the receivables and its entitlement to partial summary judgment. In preparing its response to the MPSJ, HASElect sought and obtained leave of Court—based upon representations of the case’s complexity—to exceed the page limit for its Opposition, ultimately filing a thirty-five-page brief (excluding exhibits). [ECF No. 127]. Additionally, HASElect proffered the declarations of Bart Larsen and Michael Griffin (“Declarations”) in support of the Opposition.

As addressed in the Reply, the scope of the Opposition and Declarations far exceeds the

1 issues Tecumseh raised in the MPSJ. This includes HASelect's assertion of allegations that are  
2 neither supported, genuine, nor material.

3 Adequately addressing the substantive issues within the contemplation of the MPSJ and  
4 the immateriality of the extraneous factual issues HASelect raised in the thirty-five-page  
5 Opposition will require Tecumseh to exceed the 15-page limit for the Reply permitted by Local  
6 Rule 9014(e)(1). Accordingly, Tecumseh requests leave to file its Reply with no more than 25  
7 pages of legal and factual analysis and argument, excluding the case caption and certification of  
8 mailing.

9 Based on the foregoing, Tecumseh respectfully requests that the Court enter an order in  
10 substantially the same form as the proposed order attached hereto as Exhibit 1 granting Tecumseh  
11 leave, pursuant to Local Rule 9014(e)(1), to file their Reply with no more than 25 pages of legal  
12 and factual analysis and argument.

13 Dated this 21<sup>st</sup> day of October, 2022.

14 Respectfully submitted,

15 GARMAN TURNER GORDON LLP

16 By: /s/ Jared M. Sechrist  
17 GERALD M. GORDON, ESQ.  
18 JARED M. SECHRIST, ESQ.  
7251 Amigo St., Suite 210  
Las Vegas, Nevada 89119

19 and

20 MICHAEL D. NAPOLI, ESQ.  
21 *Pro hac vice*  
22 AKERMAN LLP  
2001 Ross Avenue, Suite 3600  
23 Dallas, Texas 75201  
Tel: (214) 720-4360 / Fax: (214) 720-8116

24 ARIEL E. STERN, ESQ.  
25 Nevada Bar No. 8276  
26 AKERMAN LLP  
1635 Village Center Circle, Suite 200  
27 Las Vegas, Nevada 89134  
Tel: (702) 634-5000 / Fax: (702) 380-8572  
Email: ariel.stern@akerman.com

28 *Attorneys for Tecumseh-Infinity Medical  
Receivable Fund, LP*

# EXHIBIT 1

# EXHIBIT 1

GARMAN TURNER GORDON LLP  
GERALD M. GORDON  
Nevada Bar No. 229  
E-mail: [ggordon@gtg.legal](mailto:ggordon@gtg.legal)  
WILLIAM M. NOALL  
Nevada Bar No. 3549  
E-mail: [wnoall@gtg.legal](mailto:wnoall@gtg.legal)  
JARED SECHRIST  
Nevada Bar No. 10439  
E-mail: [jsechrist@gtg.legal](mailto:jsechrist@gtg.legal)  
7251 Amigo St., Suite 210  
Las Vegas, Nevada 89119  
Tel: (725) 777-3000 / Fax: (725) 777-3112

*Attorneys for Tecumseh–Infinity Medical  
Receivable Fund, LP*

MICHAEL D. NAPOLI, ESQ.  
*Pro hac vice*  
AKERMAN LLP  
2001 Ross Avenue, Suite 3600  
Dallas, Texas 75201  
Tel: (214) 720-4360 / Fax: (214) 720-8116  
Email: [michael.napoli@akerman.com](mailto:michael.napoli@akerman.com)  
ARIEL E. STERN, ESQ.  
Nevada Bar No. 8276  
AKERMAN LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
Tel: (702) 634-5000 / Fax: (702) 380-8572  
Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:  
  
INFINITY CAPITAL MANAGEMENT, INC.  
  
Debtor.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,  
  
Plaintiff,

Case No.: 21-14486-abl  
Chapter 7

Adversary Case No. 21-01167-abl

**DEFENDANT’S EX PARTE MOTION  
TO EXCEED PAGE LIMIT  
FOR REPLY TO PLAINTIFF  
HASELECT-MEDICAL  
RECEIVABLES LITIGATION  
FINANCE FUND INTERNATIONAL**

v.  
TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,  
Defendant.

**SP'S OPPOSITION TO TECUMSEH-  
INFINITY MEDICAL RECEIVABLE  
FUND, LP'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
AS TO CERTAIN DISPUTED  
RECEIVABLES**

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,  
Counter-Claimant,

Date: ExParte  
Time: ExParte

v.  
HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,  
Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,  
Counter-Claimant

v.  
TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,  
Counter-Defendant.

The Court having considered Tecumseh–Infinity Medical Receivable Fund LP’s Ex Parte  
Motion to Exceed Page Limit for Reply to Plaintiff HASElect-Medical Receivables Litigation  
Fund International SP’s Opposition to Motion for Partial Summary Judgment as to Direct Purchase

...

...

...

...

1 Receivables<sup>1</sup> (the “ExParte Motion”), and good cause appearing therefore:

2 **IT IS HEREBY ORDERED** that the Ex Parte Motion is GRANTED, and Tecumseh may  
3 file its Reply to Opposition in excess of the page limits in LR 9014(e) to include a maximum of  
4 up to twenty-five (25) pages of factual and legal analysis and arguments.

5 **IT IS SO ORDERED.**

6 PREPARED AND SUBMITTED:

7 **GARMAN TURNER GORDON LLP**

8 By: /s/Jared M. Sechrist

9 GERALD M. GORDON, ESQ.

10 JARED M. SECHRIST, ESQ.

7251 Amigo St., Suite 210

Las Vegas, Nevada 89119

11 and

12 **AKERMAN LLP**

13 /s/Michael Napoli, Esq.

14 ARIEL E. STERN, ESQ.

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

15 MICHAEL D. NAPOLI, ESQ.

16 *PRO HAC VICE*

2001 Ross Avenue, Suite 3600

Dallas, Texas 75201

17 *Attorneys for Tecumseh – Infinity Medical*  
18 *Receivables Fund, L.P.*

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

---

<sup>1</sup> All capitalized terms take on the meaning ascribed to them in the Motion, unless otherwise defined herein.